



# Guidance & Policy

PS-GP-2

Privacy Office, TRICARE Management Activity

## Personnel Security - Applying for ADP Levels of Trust

TMA is committed to the protection of patient and sensitive data it is entrusted with, while at the same time striving to make appropriate and lawful access to that information possible in order to fulfill the Department of Defense (DoD) Military Health System (MHS) mission. One measure to protect the use and disclosure of this information is the requirement of background investigations on all personnel with access to sensitive but unclassified information and related information systems. This paper specifically discusses access requirements for U. S. citizens and Non-U.S. Citizens.

### ***Why must contractors apply for ADP levels of trust?***

The Privacy Act of 1974, the Health Insurance Portability and Accountability Act (HIPAA), and the *DoD Health Information Privacy Regulation* (DoD 6025.18-R) along with the DoD 5200.2R *Personnel Security Program* (January 1987), the DoD 5200.2R *Personnel Security Program* (draft June 2002), and the DoD Information Technology Security Certification and Accreditation Process (DITSCAP) establish policy and require that the DoD put in place appropriate safeguards to protect sensitive data. These safeguards against inappropriate use and disclosure must be upheld by contractors and others who have access to information systems containing protected health information. Background checks for all personnel who will obtain access to systems holding sensitive but unclassified (SBU) data are one method of protection employed by DoD. SBU data is an informal designation for all information that, by law or regulation, requires some form of protection but is outside of a formal system for classifying national security information.

### ***What is the process for applying for and receiving IT (ADP) levels of trust?***

*Step 1:* The contractor is notified by the TMA contracting office of the need for the IT (ADP) level of trust and SF-85P submission requirement.

*Step 2:* The contractor contacts the TMA Privacy Office to obtain PIPS Form 12.

*Step 3:* The contractor applies for a Submitting Office Number (SON) by submitting PIPS Form 12 Submitting Office Number Authorization and Amendment Form to the Office of Personnel Management (OPM). The Submitting Office Identifier (SOI) number for the MHS is OM25 and is to be entered in Line 2 of this form. The form should be filled out with the contractor's fax number on the bottom and faxed or mailed to the OPM office in Boyers, PA. The contact information (also on the form) is:

US Office of Personnel Management Investigations Service  
Federal Investigations Processing Center  
P.O. Box 618  
Boyers, PA 16018-0618  
Tel (724) 794-5612  
Fax (724) 794-2891

If the form is faxed, the contractor should receive the SON by return fax in approximately two to three days and should then notify the TMA Privacy Office of the SON.

- [adp.mail@tma.osd.mil](mailto:adp.mail@tma.osd.mil) -



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*Step 4:* The contractor must provide a copy of the completed PIPS Form 12 to the TMA Privacy Office. It may be faxed or mailed to:

TMA Privacy Office  
5111 Leesburg Pike, Suite 810  
Falls Church, VA 22041  
Fax 703.998.5038

*Step 5:* The contractor must next fill out and print form SF-85P, submitting it in hard copy. Two options are available to complete step #5: (A) You may access form SF-85P on the OPM website at <http://www.opm.gov/forms/pdfimage/sf0085p.pdf>. This form must be submitted in hard copy to OPM. If it is submitted electronically, the first section, labeled “Agency Use Only” must be filled out. The SF-85P must be submitted with the FD-285 fingerprint card (available from OPM) to OPM at the Boyers, PA address noted on the previous page. Instructions for completing the “Agency Use Only” block follow. Please note that **bold** text indicates the exact code or text to be entered. All other text is descriptive.

Field	Field Name	What to Enter
A	Type of Investigation	Depends on level of IT (ADP) applying for: IT (ADP) I – use code <b>30B</b> IT (ADP) II – use code <b>08B</b> IT (ADP) III – use code <b>06A</b>
B	Extra Coverage	N/A
C	Sensitivity/Risk Level	Depends on level of IT (ADP) applying for: IT (ADP) I – use code <b>6</b> (High Risk) IT (ADP) II – use code <b>5</b> (Moderate Risk) IT (ADP) III – use code <b>1</b> (Low Risk)
D	Compu/ADP	Enter <b>C</b> if investigation is for an IT (ADP)-Computer position. If not, leave blank.
E	Nature of Action Code	Enter <b>CON</b> for Contractor
F	Date of Action	Leave blank
G	Geographic Location	Leave blank
H	Position Code	Leave blank
I	Position Title	Enter <b>CON</b> for contractor
J	SON	Enter code <b>480G</b> for TMA Privacy Office



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Field	Field Name	What to Enter
K	Location of Official Personnel Folder	Check the correct box that gives the location of the OPF. <b>NONE:</b> If the person has never been a Federal employee <b>NPRC:</b> If the OPF is at the National Personnel Records Center <b>AT SON:</b> If the OPF is at the Submitting Office <b>OTHER ADDRESS:</b> If the OPF is at any other location (for example, the SOI), give the address.
L	SOI	Enter <b>DD03</b> for the Military Health System
M	Location of Security Folder	Check the correct box that identifies the location of the Security Folder. <b>NONE:</b> If there is no security file at your agency. <b>AT SOI:</b> If there is a security file at your agency, and it should be reviewed. <b>NPI:</b> If there is a security file at your agency, but it contains no pertinent information. <b>OTHER ADDRESS:</b> If your agency's security file should be reviewed and it is not at the SOI, furnish the address.
N	OPAC-ALC Number	Enter <b>DOD-TMA</b>
O	Accounting Data and/or Agency Case Number	Enter the contracting company's SON
P	Requesting Official	Enter the name, title, and signature of the contractor's facility security office, as well as the date and telephone number, including area code.

(B) The other option is for the contractor to fill out the Electronic Personnel Security Questionnaire (EPSQ), available on the Defense Security Service (DSS) website at <http://www.dss.mil/search-dir/epsq/sub.htm>. Instructions and additional information are also available at the site. For help, call the

EPSQ support toll-free hotline at (800) 542-0237. The EPSQ must be printed out and submitted in hard copy to OPM. The Agency Use Only Block is not included on the EPSQ but is required. See above section (A) for directions on filling it out.

*Note: Common discrepancies in the completion of the SF-85P include not filling in the section requesting a middle name, if you do not have a middle name put nm. Every section should be filled with the appropriate information; please make sure that there are no blanks sections on the SF-85P.*

**Step 6:** The contractor's security officer or designee reviews the SF-85P or EPSQ and verifies that there are no security risk red flags. The contractor should then contact the TMA Privacy Office to

- [adp.mail@tma.osd.mil](mailto:adp.mail@tma.osd.mil) -



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inform personnel of the submission of the SF-85P or EPSQ to OPM. Additional information that should be relayed to the TMA Privacy Office is: company name, SON #, employee name(s), Social Security numbers, ADP level (s), date the application was submitted to OPM, U.S. citizenship (yes or no), and date of hire for non-U.S. citizens. In addition, please provide an e-mail verification that no security risk red flags were found in the initial review. If submitted from a TMA Program Office, the name of the Program Office and specific program application should be included.

*Step 7:* Once OPM receives and pre-screens the application, it sends an Investigation Scheduled Notice (ISN) to the TMA Privacy Office. An ISN notifies the applicant that their investigation has been added to OPM's workload and will take place in the near future.

*Step 8:* The TMA Privacy Office sends the original ISN to the contractor and keeps a copy.  
INTERIM ACCESS GUIDELINES HAVE NOT BEEN APPROVED, BUT ARE UNDER REVIEW BY DoD.

*Step 9* OPM conducts an investigation. The type and level of investigation performed depends on the level of trust requested. The different levels of trust are outlined below.

IT (ADP) Level	Investigations Required	Degree
ADP I	NAC + SSBI	Highest
ADP II	NACLC	Medium
ADP III	NAC	Lowest

**NAC** = National Agency Check (includes employment history for last 5 years, education history for last 5 years and highest degree verified, residence history for last 3 years, references, law enforcement agency check for last 5 years)

**NACLC** = National Agency Check with Local Credit Check (includes all elements of NAC plus financial review from last 5-7 years, verification of date and place of birth, and local law enforcement agency check for last 5-7 years)

**SSBI** = Single Scope Background Investigation (includes National Agency Check, local agency checks, personal subject interview, verification of date and place of birth, court records for last 5 years, at least 4 references, interviews with neighbors for last 5 years, credit history for last 7 years, verification of US citizenship, background check on former spouse for last 10 years, spouse/cohabitant National Agency Check)

*After 30 days, the contractor should check with OPM on the status of the ADP submittal.*

*Step 10:* If the TMA Privacy Office, OPM, or any of the adjudicating offices request further information and the applicant fails to provide it, the investigation will be terminated and a Denial of Access will be issued. If denied access, the applicant is prohibited from resubmitting an application for one year from the date of denial.



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*Step 11:* After the investigation has been completed, a Contractor Employee Trustworthiness Determination will be issued to the TMA Privacy Office and forwarded to the contractor. The contractor gains access to the system but must provide the TMA Privacy Office of verification that the employee has taken the Information Assurance Security Test on the TMA Privacy Office website.

***Should someone be notified if a person no longer works for the contractor who submitted his or her investigation?***

Yes. You should notify the TMA Privacy Office and OPM to discontinue an investigation. When the case is not discontinued, OPM spends time investigating someone who is not going to be cleared or hired, and this may have a negative effect on overall timeliness.

***How does a contractor obtain more information on the status of applications for IT (ADP) levels of trust?***

Thirty days after submitting an application, a contractor may contact OPM to inquire about the status of their application. Please **do not** call the TMA Privacy Office regarding the status of your application.

***How can I get more information?***

- TMA Privacy Office: For further information on ADP level of trusts, please contact [adp.mail@tma.osd.mil](mailto:adp.mail@tma.osd.mil).
- DSS website: [www.dss.mil/epsq](http://www.dss.mil/epsq)
- OPM website and contact numbers:
  - [www.opm.gov/extra/investigate](http://www.opm.gov/extra/investigate)
  - Liaison office: (724) 794-5228
  - Status desk: (724) 794-5612 ext.168
  - Mailing Address:

U.S. Office of Personnel Management  
Federal Investigations Processing Center  
P.O. Box 618  
1137 Branchton Road  
Boyers, PA 16018-0618

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